

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TRACKTHINGS LLC,)	
)	C. A. No.: 22-981-RGA-JLH
Plaintiff,)	(CONSOLIDATED)
)	
v.)	JURY TRIAL DEMANDED
)	
NETGEAR, INC.,)	
)	
Defendant.)	

CERTIFICATION

Pursuant to the Court’s March 7, 2022 Standing Order for Objections Filed Under Fed. R. Civ. P. 72, Defendant NETGEAR, Inc. (“NETGEAR”) hereby certifies that the foregoing objections do not raise any new legal or factual arguments that were not previously raised before the Magistrate Judge through briefing or at the June 21, 2023 *Markman* Hearing. There are three cases cited in the Objections that were not cited in the briefing. Counsel for NETGEAR relied on *Haliburton Oil Well Cementing Co. v. Walker*, 329 U.S. 1 (1946) in the *Markman* Hearing. See D.I. 143, Tr. at 88:5-16, 91:8-13. Counsel for NETEGAR also relied on “the entire line of *WMS Gaming* cases” in the *Markman* Hearing. *Id.* at 88:17-89:3. *Advanced Ground Information Systems, Inc. v. Life360, Inc.*, 830 F.3d 1341 (Fed. Cir. 2016) and *Rain Computing, Inc. v. Samsung Electronics America, Inc.*, 989 F.3d 1002 (Fed. Cir. 2021) are part of the “line of *WMS Gaming* cases.” *See id.* *Rain Computing* specifically cites *WMS Gaming*. 989 F.3d at 1007. *Advanced Ground Information Systems* does not specifically cite *WMS Gaming*, but it cites several cases that, in turn, cite *WMS Gaming*. *Advanced Ground Info. Sys.*, 830 F.3d at 1349.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ James L. Higgins

Melanie K. Sharp (No. 2501)
James L. Higgins (No. 5021)
Taylor E. Hallowell (No. 6815)
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
msharp@ycst.com
jhiggins@ycst.com
thallowell@ycst.com

COOLEY LLP
Joseph M. Drayton
55 Hudson Yards
New York, NY 10001-2157
(212) 479-6000

Reuben Chen
3175 Hanover Street
Palo Alto, CA 94304-1130
(650) 843-5000

Naina Soni
1299 Pennsylvania Avenue, NW
Suite 700
Washington, DC 20004-2400
(202) 842-7800

Dated: August 16, 2023

Attorneys for NETGEAR, Inc.

30659599.1